

IN THE UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

SCOTT GANGLOFF : CIVIL ACTION NO: 02-CV-4615
634 Fountain Street :
Philadelphia, PA 19128, :
Plaintiff, :
v. :
SEARS ROEBUCK & CO. and : Hon. Eduardo C. Robreno
VAUGHAN & BUSHNELL :
MANUFACTURING CO. :
Defendants. :
:

DEFENDANTS' PROPOSED VOIR DIRE

AND NOW, comes the defendants, Sears, Roebuck and Co. and Vaughan & Bushnell Manufacturing Co., by and through their undersigned counsel, and file the within Proposed Voir Dire:

1. Have you ever served on a jury before?

a. If so, what type of case?

b. What was the result in that case?

ACCEPTED _____ REJECTED _____

2. Have you or any member of your family ever been involved in a civil lawsuit?

ACCEPTED _____ REJECTED _____

3. Have you or any member of your family ever received workers compensation?

ACCEPTED _____ REJECTED _____

4. Do you feel that a large corporation should be treated any differently in a court of law or is less entitled to justice than an individual citizen?

ACCEPTED _____ REJECTED _____

5. Are you or any member of your family employed by a police department or other law enforcement agency?

ACCEPTED _____ REJECTED _____

6. Are you or any member of your family involved with the Boy Scouts of America?

ACCEPTED _____ REJECTED _____

7. Do you own a hammer?

ACCEPTED _____ REJECTED _____

8. Do you own safety goggles or safety glasses?

ACCEPTED _____ REJECTED _____

9. Have you or any member of your family ever been injured when using a hand tool or power tool?

ACCEPTED _____ REJECTED _____

10. Have you or any member of your family ever suffered an eye injury?

ACCEPTED _____ REJECTED _____

11. Do you suffer from any vision problems beyond wearing eyeglasses or contact lenses?

ACCEPTED _____ REJECTED _____

12. Have you or any member of your family ever had any problem with Sears, Roebuck and Co.?

ACCEPTED _____ REJECTED _____

13. Have you or any member of your family ever had any problem with a Craftsman tool?

ACCEPTED _____ REJECTED _____

14. Have you or any member of your family ever had any problem with Vaughan & Bushnell Manufacturing Co.?

ACCEPTED _____ REJECTED _____

15. Do you believe that if a person is injured when using a product, the manufacturer should be liable for any injury the user may have suffered?

ACCEPTED _____ REJECTED _____

16. Do you believe that a manufacturer has a duty to make a product accident proof?

ACCEPTED _____ REJECTED _____

17. Do you believe that the manufacturer of a product should be held liable for an injury the user may have suffered because the user failed to follow warnings on the product itself?

ACCEPTED _____ REJECTED _____

Respectfully submitted,

CIPRIANI & WERNER, P.C.

BY:

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Counsel for the Defendants

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the within DEFENDANTS' PROPOSED VOIR DIRE was served upon plaintiff's counsel via first class mail, postage prepaid, on July 9, 2004, as follows:

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